

EXHIBIT B

-TO-

**HOUSEHOLD LIFE INSURANCE COMPANY'S
EMERGENCY MOTION TO INTERVENE TO SUE
RECEIVER AND TO STAY RULING ON
RECEIVER'S MOTION TO APPROVE INITIAL
PLAN OF DISTRIBUTION (DOC. 114) AND
MEMORANDUM OF LAW IN SUPPORT
THEREOF**

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

AUBREY LEE PRICE; et al

Defendants,

HOUSEHOLD LIFE
INSURANCE COMPANY

Intervention Plaintiff,

v.

MELANIE E. DAMIAN,
in her capacity as Receiver,

Intervention Defendant.

Civil Action No.
1:12-cv-2296-TCB

AFFIDAVIT OF ANDREA J. GIANNETTA

STATE OF RHODE ISLAND

COUNTY OF KENT

Personally appearing before me, the undersigned officer duly authorized to administer oaths, is Andrea J. Giannetta who, after being duly sworn, deposes and says:

1. My name is Andrea J. Giannetta, and I am over eighteen (18) years of age and competent to make this affidavit. I have personal knowledge of the statements set forth herein and I make this affidavit for any lawful use or purpose.

2. At all times relevant hereto, I have been employed by Enstar (US) Inc. as a Senior Vice President, Litigation Legal Counsel. In my capacity as Senior Vice President, I oversee litigation for Household Life Insurance Company, among other companies of Enstar Group Limited. I have knowledge of the payment of death benefits pursuant to Household Life Insurance Company Policy No. 4270711 ("Policy"), a life insurance policy insuring the life of Aubrey Lee Price ("Price").

3. On or around January 14, 2013, Melanie E. Damian, the court-appointed receiver ("Receiver") for Price's estate in *SEC v. Price*, et al, Case No. 1:12-CV-2296-TCB, filed a claim seeking payment of the proceeds of the Policy. Specifically, on January 14, 2013, the Receiver notified Household Life Insurance Company that she was making a claim on the Policy and submitted the Order Granting Petition for Presumptive Death Certificate. On February 4, 2013, the Receiver completed a Term Life Claim Form.

4. Having received the Order Granting Petition for Presumptive Death Certificate and the Term Life Claim Form, Household Life Insurance Company paid to the Receiver the sum of \$543,561.64 (the "Payment") on March 8, 2013. The Payment consisted of the Policy proceeds of \$500,000.00 and interest of \$43,561.64.

5. On January 10, 2014, after receiving notification that Mr. Price was discovered alive during a traffic stop in Glynn County, Georgia, I contacted counsel for the Receiver via telephone and requested that the Receiver return the Payment in full. The Receiver's counsel informed me that the Receiver would not return the Payment to Household Life Insurance Company.

FURTHER AFFIANT SAYETH NOT.

Andrea J. Giannetta
Andrea J. Giannetta, Affiant

Sworn to and subscribed before me this 21 day of January, 2014.

Jessie M Seal
Notary Public

My Commission Expires: May 18, 2014

